

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

PAMELA COLLINS,

Plaintiff,

vs.

MOUNTAIN LAUREL ASSURANCE  
COMPANY,

Defendant.

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**Docket No. 3:10-cv-451**  
**Phillips/Shirley**

**MOTION TO COMPEL DISCOVERY**

Comes Progressive Direct Insurance Company, by and through counsel, pursuant to Rules 33, 34 and 37 of the *Tennessee Rules of Civil Procedure*, and moves this Honorable Court for entry of an Order compelling the Plaintiff to answer Interrogatories and Request for Production of Documents which were propounded to her more than thirty (30) days ago. In support of its Motion, the Defendant states that the Interrogatories and Request for Production of Documents were, indeed, propounded to the Plaintiff more than 30 days ago and have remained unanswered to date. This Defendant also states that attempts have been made by correspondence and telephone to resolve any discovery dispute without success.

WHEREFORE, Progressive Direct Insurance Company, moves this Honorable Court for entry of an Order compelling the Plaintiff to answer Interrogatories and Request for Production of Documents accordingly.

Respectfully submitted this 4th day of March, 2011.

**TRAMMELL, ADKINS & WARD, P.C.**

s/ Terrill L. Adkins  
Terrill L. Adkins, Esq. BPR# 013138  
Attorney for Progressive Direct Insurance Company  
P.O. Box 51450  
Knoxville, Tennessee 37950

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2011, a copy of the foregoing Motion to Compel was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

**TRAMMELL, ADKINS & WARD, P.C.**

s/ Terrill L. Adkins  
Terrill L. Adkins